

HWP Camden  
Modine Heat Transfer, Inc.  
LOW # 96-J.C.007

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shott, Director

RECEIVED

JUL 02 1996

DIVISION OF ENVIRONMENTAL QUALITY  
Jefferson City Regional Office  
1511 Christy Drive P.O. Box 176 Jefferson City, MO 65102  
(573)751-2729  
FAX (573)751-0014

June 26, 1996

CERTIFIED MAIL #Z 062 476 789  
RETURN RECEIPT REQUESTED

Mr. Gaylord S. Olsen  
Modine Heat Transfer, Inc.  
Plant Manager  
P.O. Box 636  
Camdenton, Missouri 65020

RECEIVED

JUL 02 1996

HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Dear Mr. Olson:

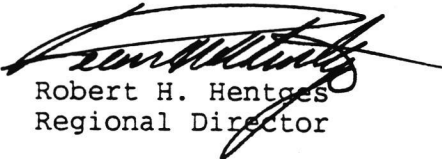
Please find enclosed a copy of the Hazardous Waste Compliance Inspection Report for the Modine Heat Transfer, Inc. facility in Camdenton, Missouri. The report, I believe, is self-explanatory.

To show a return to compliance, Modine is requested to submit, in writing, within 30 days of receipt of this letter, a description of all corrective actions taken and/or a schedule for completion of necessary corrective actions. The compliance documentation must be submitted to this office with a copy sent to Ms. Kathy Flippin, Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102.

You may call James M. Wells, of my staff, at (573) 751-2729 if you have any questions regarding the report or this letter.

Sincerely,

JEFFERSON CITY REGIONAL OFFICE

  
Robert H. Hentges  
Regional Director

RHH/jwl

Enclosure

c: Hazardous Waste Program



MISSOURI HAZARDOUS WASTE MANAGEMENT LAW  
COMPLIANCE EVALUATION INSPECTION REPORT  
June 26, 1996

**FACILITY**

Modine Heat Transfer, Inc.  
P.O. Box 636  
Sunset Drive  
Camdenton, Mo. 65020  
(573) 346-5693

EPA ID #: MOD062439351  
Mo. ID #: 001417

**PARTICIPANTS**

Department of Natural Resources

James M. Wells  
Environmental Specialist  
Jefferson City Regional Office

Modine Heat Transfer, Inc.

Mr. Don Mans  
Plant Engineer

**INTRODUCTION**

A Hazardous Waste Compliance Inspection was conducted at the Modine Heat Transfer, Inc. (MHTI) facility on June 21, 1996. The inspection was conducted under the authority of Sections 260.375(9) and 260.377 RSMo for the purpose of determining the compliance status of the facility relating to hazardous waste handling and disposal. Mr. Gaylord Olson, Plant Manager, and Mr. Bob King, Manager, Plant/Process Engineering were present during the exit briefing.

**FACILITY DESCRIPTION**

MHTI is a manufacturing facility that produces air conditioning coils and feeder parts from aluminum and copper tubing. The manufacturing processes include aluminum and copper cutting and brazing, metal cleaning, vapor degreasing (one monorail vapor degreaser using Methylene Chloride), painting and packaging. MHTI operates a pretreatment unit to neutralize and treat waste water prior to discharge to the city sewer. The unit is equipped with a filter press. The filtered sludge is carted approximately 10 feet to a sludge dryer for further volume reduction.

Two years ago, MHTI utilized an aggressive nitric acid in their metal cleaning process. Thus, causing the unit to be classified as metal etching and milling. They switched to a less aggressive acid and now consider the process to be "metal cleaning," not etching. Further, MHTI no longer operates their electroplating line. Electroplating is contracted out, off-site.

MHTI operates a totally enclosed distillation unit for the reclamation of spent Methylene Chloride. Still bottoms are hard piped to a 2,500 gallon storage tank. This tank is considered to

Modine Heat Transfer, Inc.  
Compliance Evaluation Inspection  
June 26, 1996  
Page Two

be a part of the distillation unit, not a RCRA tank system. The tank is emptied when full (approximately every 10 to 12 months). MHTI intends to discontinue all solvent degreasing. The next shipment of still bottoms is expected to be the last.

MHTI also operates a recovery unit for used fin oil. The unit operates under resource recovery certification # RR0533. The reclaimed oil is reused on-site.

MHTI is classified as an interim status storage facility. The facility completed closure of their storage area on October 17, 1990. The closure plan was approved by the department with conditional modifications.

MHTI currently generates five hazardous waste streams:

1. Waste Methylene Chloride/Oil Mixture Still Bottoms - This F001 waste (previously 1,1,1 Trichloroethane) is generated in reclamation of spent methylene chloride from a vapor degreasing operation. The distillation unit meets the criteria for a totally enclosed treatment facility and does not require resource recovery certification. The waste is managed under a contract with Safety Kleen. The generation rate is 100 gallons per month.
2. Waste Paint Related Material - This F003/D001 waste is generated from maintenance operations. It is generated at the rate of 30 gallons per month and is disposed of through Safety Kleen.
3. Wastewater Pretreatment Sludge - This F006 waste was generated in the facility's wastewater pretreatment process. The process generating this waste was categorized as an "etching and chemical milling process". MHTI reports that the material consistently tested below TCLP regulatory limits over a three year period. In early 1996, they determined that the process generating the waste from the less aggressive metal cleaner was no longer "etching and chemical milling", and reclassified the waste stream as non-hazardous. It is still disposed of through Chemical Waste Management.
4. Used Oil - This waste is generated in maintenance and processes throughout the plant. The generation rate is 3 to 4 drums per quarter. Waste hydraulic oil is blended in the Safety Kleen transport truck with waste stream # 1, F001/F003 solvent, for a fuel blending program. Waste Fin Oil is reclaimed under resource recovery certification for use on-site.
5. Waste Acid - This D002 waste is a metal cleaning waste that is contaminated with copper. Brazed parts have a copper oxide scale and flux that is removed with acid. It is currently generated at the rate of 800 gallons per year. It is treated on-site in the pretreatment unit prior to discharge to the city sewer.

#### UNSATISFACTORY FEATURES

Federal regulations cited are those adopted by reference in state regulations or those for which the state has agreed to pursue enforcement action.

1. Failure to submit an updated registration form; 10 CSR 25-5.262(2)(A)4. A person required to register shall complete and file an updated generator registration form if the information filed with the department changes. MHTI did not file an updated registration form when the F006 pretreatment sludge waste stream was reclassified. MHTI must file an updated generator notification form to reflect the waste streams that are currently being generated. A Notification of Regulated Waste Activity form was given to Mr. Mans during the inspection.

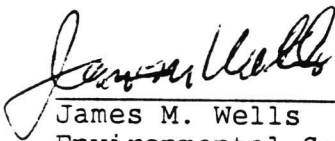
#### COMMENTS

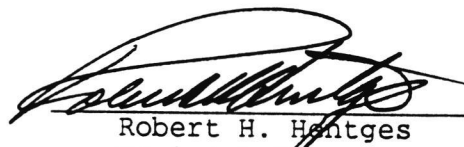
During the inspection the topic of resource recovery certification for the on-site recovery and reuse of fin oil was raised. Resource recovery certification is no longer required for the following reason. Regulation 10 CSR 25-9.020(1)(A) states that "A certification is not required under this rule for the owner/operator of a facility managing used oil in accordance with 40 CFR part 279 as incorporated in 10 CSR 25-11.279."

Groundwater monitoring wells number two and number three were inspected. The surface casing and surface grout on both appeared to be in good condition. Monitoring well number two was locked; well number three was not. Mr. Mans locked the padlock and will instruct the contractor to insure that they are kept locked.

Submitted by:

Approved by:

  
James M. Wells  
Environmental Specialist

  
Robert H. Hentges  
Regional Director

Attachments

c: Hazardous Waste Program



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
LARGE QUANTITY GENERATOR  
**INSPECTION RECORD AND CHECKLIST**

**L**  
LOG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Modine Heat Transfer</i>		DATE <i>6/21/96</i>	EPA I.D. NUMBER <i>MOD062439351</i>
ADDRESS <i>Sunset Drive</i>		RR NO.	MO I.D. NUMBER <i>.801417</i>
CITY <i>Clendenon</i>	NUMBER OF EMPLOYEES <i>140</i>	YEARS AT SITE	TELEPHONE NUMBER <i>(573) 346-5693</i>

FACILITY REPRESENTATIVE(S), TITLE(S)

*Don Matus,*

**DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.**

*See Narrative Report*

**WASTE STREAMS**

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. <i>See Narrative Report</i>			
2.			
3.			
4.			
5.			

**CHECK ALL THAT APPLY (Specify if possible)**

<input type="checkbox"/> NPDES Permit	<input type="checkbox"/> Lead/Acid Batteries	<input type="checkbox"/> POTW _____
<input type="checkbox"/> Septic Tank	<input type="checkbox"/> H.W. Burner/Blender/Marketer	<input type="checkbox"/> Solid Waste Landfill _____
<input checked="" type="checkbox"/> Air Permit	<input type="checkbox"/> Precious Metal Reclamation	<input checked="" type="checkbox"/> Waste Water Pretreatment

# A. GENERAL

1 <input checked="" type="checkbox"/>	Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2 <input checked="" type="checkbox"/>	Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3 <input checked="" type="checkbox"/>	Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4 <input checked="" type="checkbox"/>	Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5 <input checked="" type="checkbox"/>	Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

## COMMENTS

# PART 1: WALK-THROUGH INSPECTION

## B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1 <input checked="" type="checkbox"/>	Storage does not exceed 90 days or 180/270 days if facility generates < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)	GPT
2 <input type="checkbox"/>	Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171	GPT
3 <input type="checkbox"/>	Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172	GPT
4 <input type="checkbox"/>	Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
5 <input type="checkbox"/>	Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)	GPT
6 <input checked="" type="checkbox"/>	Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262 (2)(C)2.B.(I)	GOR
7 <input checked="" type="checkbox"/>	Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262 (2)(C)2.B.(III)(a).	GOR
8 <input checked="" type="checkbox"/>	Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b).	GOR
9 <input checked="" type="checkbox"/>	Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c).	GOR
10 <input checked="" type="checkbox"/>	Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d).	GOR
11 <input checked="" type="checkbox"/>	Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e).	GOR
12 <input checked="" type="checkbox"/>	Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7. and 8.	GPT
13 <input type="checkbox"/>	Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
14 <input type="checkbox"/>	Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	GOR
15 <input type="checkbox"/>	Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT
16 <input checked="" type="checkbox"/>	Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(I) and (II) referencing 40 CFR 265.174	GPT
17 <input checked="" type="checkbox"/>	Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
18 <input checked="" type="checkbox"/>	Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35	GPT
19 <input checked="" type="checkbox"/>	Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
20 <input checked="" type="checkbox"/>	"No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
21 <input checked="" type="checkbox"/>	Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

## COMMENTS

NO change of waste in storage other than in process tank & satellite accumulation

## C. SATELLITE ACCUMULATION

1 <input checked="" type="checkbox"/>	Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)	GPT
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## COMMENTS



2	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
3	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
4	<input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
5	<input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	GPT
6	<input checked="" type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR
7	<input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR

#### COMMENTS

1 drum paint waste 12/95  
used oils for on-site  
recovery/reuse

#### D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1	<input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31	GPT
2	<input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.	GPT
3	<input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)	GPT
4	<input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)	GPT
5	<input checked="" type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)	GPT
6	<input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33	GPT

#### COMMENTS

#### E. LOG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.	MC 2000 Gall Bottoms	2500 G	Yes - OK	
2.				
3.				
4.				
5.				

1	<input checked="" type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)	GPT
2	<input checked="" type="checkbox"/> Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)	GPT
3	<input checked="" type="checkbox"/> Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)	GPT
4	<input checked="" type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)	GPT
5	<input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)	GPT
6	<input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)	GPT
7	<input checked="" type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)	GPT

#### COMMENTS

\*  
TANK IS PART OF DISTILLATION  
PROCESS - HAND PIPED

8. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR
9. <input type="checkbox"/> Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)	GPT
10. <input type="checkbox"/> Secondary containment system provided for tanks and equipment; installed after July 14, 1986; storing dioxin waste; over 15 years old; of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT
11. <input type="checkbox"/> Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)	GPT
12. <input type="checkbox"/> Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)	GPT
13. <input type="checkbox"/> Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)	GPT
14. <input type="checkbox"/> Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
15. <input type="checkbox"/> Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
16. <input type="checkbox"/> Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)	GOR
17. <input type="checkbox"/> Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
18. <input type="checkbox"/> Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)	GPT
19. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
20. <input type="checkbox"/> Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)	GPT
21. <input type="checkbox"/> Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)	GPT
22. <input type="checkbox"/> Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)	GPT
23. <input type="checkbox"/> Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192	GPT
24. <input type="checkbox"/> Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191	GPT
25. <input type="checkbox"/> Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)	GPT
26. <input type="checkbox"/> Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196	GPT

# COMMENTS



# PART 2: RECORDS INSPECTION

## F. MANIFESTS

<input checked="" type="checkbox"/>	Facility uses manifest system - 260.380.1.(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR
<input checked="" type="checkbox"/>	Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR
<input checked="" type="checkbox"/>	Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR
<input checked="" type="checkbox"/>	Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	GOR
<input checked="" type="checkbox"/>	Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	All transporters' names, phone numbers, MO & EPA I.D.'s, license plate # - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.	GMR
<input checked="" type="checkbox"/>	Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	GOR
<input checked="" type="checkbox"/>	Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	GOR
<input checked="" type="checkbox"/>	Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.	GRR
<input checked="" type="checkbox"/>	Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.	GOR

## COMMENTS

*Reviewed manifests for last 1 1/2 years. spot checked 3 years*

## G. LAND DISPOSAL RESTRICTIONS

<input checked="" type="checkbox"/>	Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
<input checked="" type="checkbox"/>	Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)	GLB
<input checked="" type="checkbox"/>	"Land-Ban" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
<input checked="" type="checkbox"/>	Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
<input checked="" type="checkbox"/>	Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)	GLB

## COMMENTS

## H. PERSONNEL TRAINING

<input checked="" type="checkbox"/>	Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	GPT
<input checked="" type="checkbox"/>	Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)	GPT
<input checked="" type="checkbox"/>	Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)	GPT
<input checked="" type="checkbox"/>	Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)	GPT
<input checked="" type="checkbox"/>	Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)	GPT

## COMMENTS

6. <input checked="" type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	GPT	COMMENTS
7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	GPT	
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	GPT	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	GPT	

#### I. CONTINGENCY PLAN

1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	GPT	COMMENTS <i>Revised 4/25/96</i>
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	GPT	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
7. <input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	GPT	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	GPT	

#### J. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2	GOR	
3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

#### K. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3	GOR	COMMENTS <i>Recover Used Oil</i>
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo	GOR	
3. <input type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR	
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(30)(E)3.	GOR	
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.	GOR	

6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	COMMENTS
7. <input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	
9. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	GOR	
10. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	GOR	
11. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	GOR	
12. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	GOR	

#### CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

Use less aggressive acid; reclassified waste stream to non-hazardous.

Plan to eliminate solvent vapor degreasing by Nov. 1996.

Ceased using 1,1,1-Trichloroethane

INSPECTOR'S SIGNATURE

*James M. White*

DATE

6/21/96